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November 2, 2023

**BY CM/ECF**

The Honorable Leonard P. Stark  
U.S. Court of Appeals for the Federal Circuit  
717 Madison Place, NW  
Washington, D.C. 20439

**Re:** *Crystalex International Corporation v. Bolivarian Republic of Venezuela*, D. Del.  
C.A. No. 1:17-mc-00151-LPS and related case *Lovati v. Bolivarian Republic of Venezuela*, D. Del. No. 1:23-mc-340-LPS

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Dear Judge Stark:

Plaintiffs Rudi Lovati (“Lovati”) and Alessandro Lucibello Piani (“Piani” and, together with Lovati, “Plaintiffs”) of the related case *Lovati v. Bolivarian Republic of Venezuela*, C.A. No. 1:23-MC-340-LPS (the “Lovati Matter”)<sup>1</sup> hereby submit, pursuant to Paragraph 3 of the Court’s Memorandum Order of October 11, 2023 (D.I. 738 of Crystalex Docket), this Supplemental Summary of Dates pursuant to which Plaintiffs confirm completion of certain of the Steps Leading to Participation in Sale. This submission supplements the summary filed on October 16, 2023 (D.I. 29 of Lovati Docket)<sup>2</sup> to advise of additional steps completed since that date.

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<sup>1</sup> Citations to the docket of the Lovati Matter appear herein as “D.I. [#] of Lovati Docket.” A copy of this Summary of Steps will be filed on both the Crystalex Docket and the Lovati Docket.

<sup>2</sup> Plaintiffs’ October 16 summary confirms completion of Steps 1-4 with documentary support.

Duane Morris

The Honorable Leonard P. Stark  
November 2, 2023  
Page 2

**STEP 5. THE CREDITOR OBTAINS A WRIT OF ATTACHMENT FI. FA., WHICH MAY BE CONDITIONED ON SUBSEQUENT EVENTS.**

On November 1, 2023, the Court conditionally granted Plaintiffs' Motion for a Writ of Attachment *Fieri Facias* (D.I. 31 of Lovati Docket at 22 (attached as Exhibit 1); D.I. 32 of Lovati Docket ¶ 4 (attached as Exhibit 2)).

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**STEP 6. THE CLERK ISSUES TO THE UNITED STATES MARSHALS SERVICE (“MARSHALS”) THE WRIT OF ATTACHMENT FI. FA.**

**To be completed.** Plaintiffs will undertake efforts related to Step 6 now that Step 5 has been completed.

\* \* \* \* \*

**STEP 7. THE U.S. MARSHALS SERVICE SERVES THE CREDITOR’S WRIT OF ATTACHMENT, PERFECTING THE WRIT AND ATTACHING THE SHARES OF PDVH OWNED BY PDVSA.**

**To be completed.** Plaintiffs will undertake efforts related to Step 7 following satisfaction and completion of Step 6. The deadline to complete Step 7 (Perfected Writ) is April 11, 2024 per the Court’s October 11, 2023 Memorandum Order (D.I. 738 of Crystalex Docket).

\* \* \* \* \*

Counsel is available at the convenience of the Court or the Special Master should there be any questions or concerns regarding the foregoing.

Very truly yours,

/s/ Mackenzie M. Wrobel  
Mackenzie M. Wrobel (#6088)

*Counsel for Rudi Lovati and  
Alessandro Lucibello Piani*

Enclosures

CC: All Counsel of Record (via CM/ECF)